

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

NATIONAL RELIGIOUS BROADCASTERS,  
SAND SPRINGS CHURCH, FIRST BAPTIST  
CHURCH WASKOM, and INTERCESSORS  
FOR AMERICA

Plaintiffs,

v.

BILLY LONG, IN HIS OFFICIAL  
CAPACITY AS COMMISSIONER OF  
THE INTERNAL REVENUE SERVICE, and  
THE INTERNAL REVENUE SERVICE

Defendants.

Civil Action No. 6:24-cv-00311-JCB

**Joint Motion to Stay All Deadlines and Notice of Settlement**

Pursuant to the Court's Standing Order, Plaintiffs National Religious Broadcasters, Sand Springs Church, First Baptist Church Waskom, and Intercessors for America ("Plaintiffs") and Defendants Billy Long,<sup>1</sup> in his Official Capacity as Commissioner of The Internal Revenue Service, and The Internal Revenue Service ("Defendants") respectfully file this Joint Motion to Stay All Deadlines and Notice of Settlement. The Parties hereby notify the Court that they have reached a settlement in principle resolving the matters in controversy between them in the above-styled action, contingent upon the Court's approval and entry of a consent judgment jointly proposed by the parties. The Parties request that the Court stay all deadlines and settings in said action for thirty (30) days to allow ample time for the parties' to submit appropriate dismissal papers and for the Court to rule on the Parties forthcoming motion for entry of agreed judgment.

Date: July 7, 2025

Respectfully Submitted,

/s/ Michael Farris

Michael Farris

DC Bar No. 385969

/s/ Jonathan L. Blacker

Jonathan L. Blacker

Senior Litigation Counsel

<sup>1</sup> Commissioner Long is automatically substituted under Federal Rule of Civil Procedure 25(d).

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### **Certificate of Service**

I certify that on July 7, 2025 a true and correct copy of foregoing document was served on all counsel of record electronically through the electronic filing manager.

/s/ Jonathan L. Blacker  
JONATHAN L. BLACKER

### **Certificate of Conference**

This is to certify that counsel for Defendants conferred with counsel for Plaintiffs concerning the relief sought in this motion and the parties are in agreement with the same.

/s/ Jonathan L. Blacker  
JONATHAN L. BLACKER